

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

EXHIBIT

C

BRAD AMOS,)
) Case No. 3:21-cv-00923
Plaintiff,)
) District Judge Richardson
v.)
) Magistrate Judge Holmes
THE LAMPO GROUP, LLC, et al,)
) Jury Demand
Defendants.)

CONFIDENTIALITY LOG FOR THE DEPOSITION OF ARMANDO LOPEZ

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. Armando Lopez’s home address, Page 7, Lines 21-23.
2. Discussion of Armando Lopez’s family members, Page 7, Line 24 through Page 8, Line 10.
3. Discussion of Lampo Group, LLC ownership, Page 39, Line 23 through Page 40, Line 3.
4. Discussion of unrelated former employee, Page 73, Lines 21-24.
5. Discussion of Confidential Exhibit F, (Bates numbers LAMPO0013119-13120), Page 81, Lines 11 through Page 85, Line 1.
6. Discussion of unrelated employee, Page 103, Line 15 through Page 108, Line 23.

Respectfully submitted,

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Plaintiff,)	
)	District Judge Richardson
v.)	
)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC, et al,)	
)	Jury Demand
Defendants.)	

**CONFIDENTIALITY LOG FOR SECOND 30(b)(6) DEPOSITION OF ARMANDO
LOPEZ**

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. Discussion of Confidential Exhibit 3, (Bates number LAMPO0051358), Page 29, Lines 4 through Page 3, Line 4.
2. Discussion of Confidential Exhibit 4, (Bates numbers LAMPO0051359-0051360), Page 37, Line 5 through Page 44, Line 8.
3. Discussion of Confidential Exhibit 5, (Bates numbers LAMPO0051361-51362), Page 44, Line 14 through Page 48, Line 2.
4. Discussion of Confidential Exhibit 6, (Bates numbers LAMPO0051364-51365), Page 48, Line 11 through Page 53, Line 8.
5. Discussion of Confidential Exhibit 7, (Bates numbers LAMPO0051366-51367), Page 54, Line 2 through Page 61, Line 16.
6. Discussion of Confidential Exhibit 8, (Bates numbers LAMPO0051368-51369), Page 61, Line 6 through Page 66, Line 16.

7. Discussion of Confidential Exhibit 9, (Bates numbers LAMPO0051370-51371), Page 66, Line 25 through Page 68, Line 23.
8. Discussion of Confidential Exhibit 10, (Bates numbers LAMPO0051187-51189), Page 69, Line 6 through Page 70, Line 18.
9. Discussion of Confidential Exhibit 11, (Bates numbers LAMPO0051062-51063), Page 70, Line 2 through Page 72, Line 20.
10. Discussion of Confidential Exhibit 12, (Bates numbers LAMPO0051066-51067), Page 73, Line 3 through Page 76, Line 5.
11. Discussion of Confidential Exhibit 13, (Bates number LAMPO0050964), Page 76, Line 13 through Page 77, Line 8.
12. Discussion of Confidential Exhibit 14, (Bates numbers LAMPO0050867-50868), Page 80, Line 21 through Page 84, Line 9.
13. Discussion of an unrelated pending lawsuit, Page 84, Line 7 through Page 86, Line 2.
14. Discussion of Confidential Exhibit 15, (Bates numbers LAMPO0050761-50765), Page 95, Line 23 through Page 97, Line 19.
15. Discussion of Confidential Exhibit 16, (Bates numbers LAMPO0050766-50769), Page 98, Line 5 through Page 99, Line 16.
16. Discussion of Confidential Exhibit 17, (Bates numbers LAMPO0050420-50423), Page 100, Line 21 through Page 102, Line 4.
17. Discussion of Confidential Exhibit 18, (Bates number LAMPO0050244), Page 102, Line 13 through Page 104, Line 11.
18. Discussion of Confidential Exhibit 19, (Bates number LAMPO0050137), Page 104, Line 21 through Page 106, Line 3.

19. Discussion of Confidential Exhibit 20, (Bates numbers LAMPO0050149-50152), Page
106, Line 13 through Page 109, Line 3.

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**UNITED STATES DISTRICT COURT
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THE LAMPO GROUP, LLC, et al,)	
)	Jury Demand
Defendants.)	

CONFIDENTIALITY LOG FOR DEPOSITION OF DAVE RAMSEY

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. Discussion and name of Dave Ramsey’s spouse and children, Page 12, Line 19 through Page 13, Line 2.
2. Discussion of ownership structure of the Lampo Group, Page 21, Line 19 through Page 22, Line 1.
3. Discussion of Confidential Exhibit 1, (Bates Number LAMPO0050497), Page 25 Line 24 through Page 32 Line 2.
4. Discussion of Confidential Exhibit 2, (Bates Numbers LAMPO0014940-14941), Page 54, Line 20 through Page 59, Line 9.
5. Discussion of Confidential Staff Meetings Page 122, Line 4 through Page 145, Line 9.
6. Identification of Jon Fulk Page 147, Line 20 and Line 23
7. Discussion of unrelated employee, Page 149, Lines 12-18.
8. Discussion of unrelated lawsuit, Page 160, Line 15 through Page 167, Line 4.

9. Discussion of unrelated former employee, Page 178, Lines 5 through Page 183, Line 12.
10. Discussion of Confidential Exhibit 17, (Bates Numbers LAMPO0013119-13120), Page 185, Line 2 through Page 188, Line 12.
11. Discussion of unrelated lawsuits, Page 208, Line 6 through Page 213, Line 10.
12. Discussion of unrelated employee, Page 240, Line 4 through Page 244, Line 16.
13. Discussion of unrelated lawsuits Page 245, Line 22 through Page 246, Line 11.

The testimony referenced below was designated confidential by agreement during the deposition (Page 173, Lines 9-10). This confidential testimony is included below for completeness.

14. Questions regarding abortion, gay marriage, and sex, Page 167, Line 5 through Page 176, Line 11; Page 213, Lines 14-20; Page 232 Line 14 through Page 240, Line 3.

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I certify that, on July 28, 2023, I sent the foregoing *Confidentiality Log for the Deposition*
of Dave Ramsey via email to:

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THE LAMPO GROUP, LLC, et al,)	
)	Jury Demand
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CONFIDENTIALITY LOG FOR DEPOSITION OF JACK GALLOWAY

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. Jack Galloway’s home address, Page 8, Lines 3-4.
2. Discussion and name of Jack Galloway’s spouse and children, Page 8, Lines 9-19.
3. Names and information of Jack Galloway’s other family members, Page 8, Line 23 through Page 10, Line 5.
4. Discussion of Confidential Exhibit 1, (Bates Number LAMPO0015851), Page 30 Line 18 through Page 32 Line 4.
5. Discussion of unrelated employee, Page 44 Lines 13-23.

Respectfully submitted,

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)	Jury Demand
Defendants.)	

CONFIDENTIALITY LOG FOR DEPOSITION OF JB WAGGONER

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. JB Waggoner’s home address, Page 8, Line 25 through Page 9 Line 1.
2. Discussion and name of JB Waggoner’s spouse and three minor children, Page 9, Lines 8-10.
3. Names and information of JB Waggoner’s other family members, Page 9, Lines 12-25.
4. Discussion of unrelated employees and staffing, Page 39 Line 15 through Page 41 Line 1.
5. Discussion of JB Waggoner’s compensation, Page 48 Line 20 through Page 50 Line 20.
6. Discussion of unrelated employees’ positions, Page 50 Line 21 through Page 51 Line 24.
7. Discussion of Confidential Exhibit 1, (Bates Number LAMPO0017449), Page 67 Line 15 through Page 67 Line 19.
8. Discussion of unrelated former employee, Page 109 Lines 6 through 18.
9. Discussion of Confidential Exhibit 5, (Bates Numbers LAMPO0013119-0013120), Page 113 Line 12 through Page 115 Line 23.

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**UNITED STATES DISTRICT COURT
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CONFIDENTIALITY LOG FOR DEPOSITION OF DAVID DICICCO

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. David DiCicco’s home address, Page 9, Lines 17-18.
2. Name of David DiCicco’s spouse, Page 10, Lines 5-7.
3. Names and information of David DiCicco’s other family members, Page 10, Lines 11-15.
4. Discussion of Confidential Exhibit 3, (Bates Numbers LAMPO001763-001764), Page 49 Line 25 through Page 53 Line 6.
5. Discussion of Confidential Exhibit 4, (Bates Number LAMPO0049622), Page 72 Line 11 through Page 74 Line 10.
6. Discussion of Confidential Exhibit 5, (Bates Number LAMPO0049643), Page 74 Line 19 through Page 75 Line 4.
7. Discussion of Confidential Exhibit 7, (Bates Number LAMPO0051430), Page 99 Line 5 through Page 101 Line 8.

8. Discussion of Confidential Exhibit 8, (Bates Numbers LAMPO0013119-0013120), Page 111 Line 1 through Page 112 Line 19.

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)	Jury Demand
Defendants.)	

CONFIDENTIALITY LOG FOR DEPOSITION OF LARA JOHNSON

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. Lara Johnson’s home address, Page 10 Line 8.
2. Discussion of personnel not related to lawsuit, Page 14 Lines 1 through 4.
3. Discussion of Confidential Exhibit 1, (Bates Number LAMPO0013095), Page 27 Line 21 through Page 29 Line 13.
4. Discussion of Confidential Exhibit 2, (Bates Number LAMPO0049628), Page 33 Line 11 through Page 35 Line 12.
5. Discussion of Confidential Exhibit 5, (Bates Number LAMPO0051432 through LAMPO0051437), Page 52 Line 13 through Page 59 Line 4.
6. List of Lara Johnson’s direct reports, Page 70 Lines 11 through 14.
7. Discussion of Confidential Exhibit 8, (Bates Number LAMPO0011563), Page 76 Line 21 through Page 78 Line 8.
8. Discussion of Confidential Exhibit 10, (Bates Number LAMPO0049779), Page 87 Line 25 through Page 88 Line 18.

9. Discussion of Confidential Exhibit 11, (Bates Number LAMPO0049970), Page 88 Line 24 through Page 95 Line 18.
10. Discussion of Confidential Exhibit 12, (Bates Number LAMPO0011535), Page 96 Line 12 through Page 98 Line 6.
11. Discussion of Confidential Exhibit 13, (Bates Number LAMPO0011963), Page 98 Line 14 through Page 102 Line 6.
12. Discussion of Confidential Exhibit 15, (Bates Number LAMPO0013278), Page 105 Line 8 through Page 107 Line 7.
13. Discussion of Confidential Exhibit 16, (Bates Number LAMPO0015307), Page 107 Line 20 through Page 109 Line 8.
14. Discussion of Confidential Exhibit 17, (Bates Number LAMPO0049641), Page 109 Line 20 through Page 111 Line 4.
15. Discussion of Confidential Exhibit 18, (Bates Number LAMPO0049914), Page 111 Line 15 through Page 112 Line 20.
16. Discussion of Confidential Exhibit 19, (Bates Number LAMPO0049706), Page 113 Line 4 through Page 114 Line 8.
17. Discussion of Confidential Exhibit 21, (Bates Number LAMPO0051506), Page 137 Line 18 through Page 138 Line 10.
18. Discussion of Confidential Exhibit 22, (Bates Number LAMPO0013119), Page 138 Line 22 through Page 140 Line 6.

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)	Jury Demand
Defendants.)	

CONFIDENTIALITY LOG FOR DEPOSITION OF LUKE LEFEVRE

Defendant, The Lampo Group, LLC, (“Lampo”), by and through undersigned counsel and pursuant to the Agreed Confidentiality Order (Doc. # 42), identifies and designates the following testimony as **Confidential**:

1. Discussion of Confidential Exhibit 9, (Bates Number LAMPO0346), Page 100 Line 22 through Page 105 Line 21;
2. Discussion of Confidential Exhibit 18, (Bates Numbers LAMPO0401-402), Page 137 Line 2 through Page 138 Line 18;
3. Discussion of Confidential Exhibit 23, (Bates Numbers LAMPO0011277-0011278), Page 156 Line 12 through Page 158 Line 10.
4. Discussion of O’Connor case, Page 200 Line 1 through Page 200 Line 25;
5. Discussion of Chris Hogan, Page 200 Line 25 through Page 202 Line 13.

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